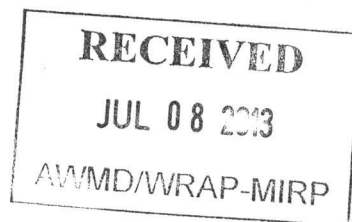


*Christine Jung* File

STATE OF MISSOURI  
**DEPARTMENT OF NATURAL RESOURCES**

Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director

www.dnr.mo.gov



July 3, 2013

CERTIFIED MAIL -7009 3410 0001 8933 5843  
RETURN RECEIPT REQUESTED

Mr. Tom Meitner  
Environmental Division  
Modine Manufacturing Company  
1500 DeKoven Avenue  
Racine, WI 53403-2552

RE: Final Quality Assurance Project Plan  
Indoor Air and Subslab Sampling  
Modine Manufacturing Facility, Camdenton, Missouri  
EPA ID# MOD062439351

Dear Mr. Meitner:

The Missouri Department of Natural Resources (Department) reviewed Modine Manufacturing Facility's Final Quality Assurance Project Plan (QAPP), Indoor Air and Subslab Sampling dated March 2013 and submitted via e-mail on June 7, 2013. CH2MHill submitted the QAPP on behalf of Modine Manufacturing Facility as required by Code of Federal Regulations 40 CFR 265, incorporated by reference in Code of State Regulations 10 CSR 25-7.265, and Section VI of Modine Manufacturing Company's Administrative Order on Consent, dated July 1999. This QAPP contains the detailed quality assurance/quality control procedures used for the sampling and analysis of indoor air, outdoor air, and sub slab vapors. The purpose of the final QAPP is to establish the requirements for generating project data that is technically valid and legally defensible.

We have enclosed comments and requests for additional information for your review and response. You must adequately address these comments before the revised QAPP can be approved. Please address the individual comments by submitting two hard copies and one electronic copy of the revised QAPP, to the Department; and one hard copy and one electronic copy to EPA, within 30 calendar days of receiving this letter.

If you need assistance or have questions regarding this letter or the enclosed comments, please contact me at the Missouri Department of Natural Resources, Hazardous Waste Program,



Mr. Tom Meitner  
July 3, 2013  
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7545 South Lindbergh, St. Louis, MO 63125-4839, by telephone at (314) 461-2464 or 1-800-361-4827, or by e-mail at christine.kump@dnr.mo.gov. Thank you.

Sincerely,

HAZARDOUS WASTE PROGRAM



Christine Kump-Mitchell, P.E.  
Environmental Engineer  
Permits Section

CKM:sw

Enclosure

c: Ms. Christine Jump, Missouri State Coordinator, U.S. EPA Region 7 ✓  
Ms. Monica Martin, Project Manager, CH2MHill  
Southwest Regional Office, Missouri Department of Natural Resources

### Comments

1. **Section 1.3.3 Regulatory History, Page 1-10, Second Paragraph:** This section states that an environmental covenant was prepared for the Modine facility. A draft environmental covenant has been prepared for the facility; however, the draft covenant has not yet been finalized or filed with the County Recorder of Deeds. The Missouri Department of Natural Resources (Department) has recently revised the model covenant template and is currently updating the template for the Modine facility. The Department will provide Modine and the current property owner with a revised draft covenant for concurrence once these revisions have been completed. After all parties have agreed to and signed the covenant, it shall be filed with the County Recorder of Deeds. This section should be modified accordingly.
2. **Section 1.3.3 Regulatory History, Page 1-10, Second Paragraph:** This section discusses the activity and use limitations set forth in the draft environmental covenant. The QAPP states that the owner or operator is required to request permission from the Department at least 60 days before soil disturbance activities beneath the building begin. The language in the current model covenant template requires 30 days written notice. This section should be modified accordingly.
3. The QAPP should include a discussion on building ventilation, heating and cooling at the Modine facility. The Modine facility building has been vacant for over a year. If the HVAC system has not been operating during that time, it could cause accumulation of vapors resulting in potentially higher concentrations. The ventilation system should be turned on prior to the sampling activities and should be operating at normal levels for an occupied building.
4. The QAPP should include an uncertainties section to discuss sampling variability due to duration of sample, time of day, time of year, anticipated use of property and any other factors that cause variability in indoor air and sub-slab vapor samples.